

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	<b>: Chapter 11</b>
	<b>:</b>
<b>EMAS CHIYODA SUBSEA LIMITED, <i>et</i></b>	<b>: Case No. 17-31146 (MI)</b>
<b><i>al.</i>,</b>	<b>:</b>
	<b>: (Joint Administration Pending)</b>
<b>Debtors.<sup>1</sup></b>	<b>: (Emergency Hearing Requested)</b>

## **NOTICE OF HEARING ON “FIRST DAY” MOTIONS AND APPLICATIONS**

**PLEASE TAKE NOTICE** that on February 27, 2017, 2017 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE THAT** on the Petition Date, the Debtors filed or plan to file, among other items, the motions and applications that are listed on Exhibit A hereto (collectively, the “First Day Pleadings”) and the Declaration of Stephen H. McGuire in Support of the Petitions and First Day Pleadings (the “First Day Declaration”).

**PLEASE TAKE FURTHER NOTICE THAT** a hearing will be held on **March 1, 2017, at 9:30 a.m. (prevailing Central Time)**, or as soon thereafter as counsel can be heard, before the Honorable Marvin Isgur United States Bankruptcy Judge for the Southern

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number and jurisdiction of formation are as follows: EMAS CHIYODA Subsea Limited (UK) (3187); EMAS Chiyoda Subsea Inc. (Delaware) (7884); EMAS CHIYODA Subsea Marine Base LLC (Texas) (5974); Lewek Falcon Shipping Pte. Ltd. (Singapore) (041E); EMAS CHIYODA Marine Base Holding Co., LLC (Texas) (7463); EMAS Chiyoda Subsea Services Pte. Ltd. (Singapore) (333Z); EMAS-AMC Pte. Ltd. (Singapore) (0442); EMAS Saudi Arabia Ltd. (Saudi Arabia) (0669); Lewek Constellation Pte. Ltd. (Singapore) (376E); EMAS CHIYODA ROV Pte. Ltd. (Singapore) (049M); EMAS CHIYODA Subsea Services B.V. (Netherlands) (4073); EMAS CHIYODA Subsea Services (UK) Limited (Scotland) (3187); EMAS CHIYODA Subsea Services LLC (Delaware) (1728); EMAS CHIYODA Subsea (Thailand) Co., Ltd. (Thailand) (1011); Gallatin Marine Management, LLC (Delaware) (8989). The address of the Debtors' U.S. headquarters is 825 Town & Country Ln, Suite 1500, Houston, TX 77024.

District of Texas, in Courtroom 404, 515 Rusk Street, Houston, Texas 77002, to consider the relief requested in the First Day Pleadings.

**PLEASE TAKE FURTHER NOTICE** that copies of the First Day Pleadings and First Day Declaration and can be obtained through the Bankruptcy Court's electronic case filing system at <https://ecf.txsb.uscourts.gov> using a PACER password (to obtain a PACER password, go to the PACER website, [www.pacer.gov](http://www.pacer.gov)) or the website maintained by the Debtors' proposed claims and noticing agent, Epiq Bankruptcy Solutions, LLC at <http://dm.epiq11.com/ECS>.

Dated: Houston, Texas  
February 28, 2017

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**EXHIBIT A**

**First Day Motions and Applications**

1. **Joint Administration Motion:** Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of the Chapter 11 Cases and (II) Granting Related Relief [Docket No. 2]
2. **Consolidated List of Creditors Motion:** Debtors Emergency Motion for Entry of an Order (I) Authorizing the Filing of a Consolidated List of Top 30 Unsecured Creditors, (II) Waiving the Requirement that Each Debtor File a List of Creditors, and (III) Authorizing the Debtors to Establish Procedures for Notifying Parties of the Commencement of These Cases [Docket No. 4]
3. **Schedules Extension Motion:** Debtors' Emergency Motion for an Order (I) Granting Additional Time to File Schedules and Statements of Financial Affairs, (II) Granting Additional Time to File Reports of Financial Information Required Under Bankruptcy Rule 2015.3, and (III) Authorizing Debtors to File Consolidating Monthly Operating Reports [Docket No. 5]
4. **Claims and Noticing Agent Application:** Debtors' Emergency Application for Order Authorizing the Employment and Retention of Epiq Bankruptcy Solutions, LLC as Claims, Noticing, Solicitation, and Administrative Agent Nunc Pro Tunc to the Petition Date [Docket 6]
5. **Employee Wages Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing, But Not Directing, the Debtors to Pay Prepetition Employee Obligations, (II) Authorizing, But Not Directing, the Debtors to Continue Certain Employee Benefit Programs in the Ordinary Course, and (III) Authorizing, But Not Directing, Applicable Banks to Honor Prepetition Checks for Payment of the Prepetition Employee Obligations [Docket No. 7]
6. **Taxes Motion:** Debtors' Emergency Motion an Order Authorizing the Debtors to Pay Certain Prepetition Taxes and Related Obligations [Docket No. 8]
7. **Insurance Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Thereunder and (B) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies and (II) Directing Financial Institutions to Honor all Related Payment Requests [Docket No. 9]
8. **Utilities Motion:** Debtors' Emergency Motion for Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service [Docket No. 10]

9. **Critical Vendor Motion:** Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing, But Not Directing, Payment of Critical Vendors and (II) Granting Related Relief [Docket No. 11]
10. **Cash Management Motion:** Debtors' Emergency Motion for an Order (I) Approving the Continued Use of The Debtors' Cash Management System and (II) Granting Related Relief [Docket No. 12]
11. **Motion to Enforce Automatic Stay:** Debtors' Emergency Motion for Order Enforcing and Restating Automatic Stay and Ipsso Facto Provisions of the Bankruptcy Code [Docket No. 13]
12. **DIP Financing Motion:** Debtors' Emergency Motion for Entry of Interim and Final DIP Orders (I) Authorizing the Debtors to Obtain Secured Superpriority Postpetition Financing, (II) Scheduling A Final Hearing, and (III) Granting Related Relief [Docket No. 14]
13. **Adequate Protection Stipulation and Agreed Order:** Anticipated to be filed prior to the hearing.